

EXHIBIT 74

12/6/2024

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)	
Individual and)	
Representative)	
Plaintiffs,)	
)	
v.)	Case No.:
)	3:23-cv-03417-VC
META PLATFORMS, INC.,)	
Defendant.)	
)	

** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **
Videotaped 30(b)(1) deposition of
NIKOLAY BASHLYKOV
Volume II

Friday, December 6, 2024

London, England
United Kingdom

Reported stenographically by:
Leah M. Willersdorf,
RMR, CRR, FBIVR, ACR, QRR2*, CLR

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1 Q. Do you have an understanding that
2 torrenting or seeding from datasets from Facebook
3 servers is also a risk, sitting here today? And
4 I would like to exclude from the answer any
5 discussions or conversations you may have had with
6 counsel.

7 MR. WEINSTEIN: Object to form, lacks
8 foundation.

9 And with his caveat, you can answer his
10 question. Obviously exclude from your answer any
11 communications you may have had with counsel, if any.

12 THE WITNESS: Sorry. Could you repeat the
13 question?

14 BY MR. YOUNG:

15 Q. Yeah. I am asking if, sitting here today,
16 you understand that torrenting or seeding datasets
17 from Facebook servers carries risk, and I would like
18 you to exclude from your answer any discussions or
19 conversations you may have had with counsel?

20 MR. WEINSTEIN: Same objection --

21 THE WITNESS: I -- sorry. Yeah.

22 MR. WEINSTEIN: Same objection.

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1 And, again, don't reveal the
2 communications with counsel. If you can answer the
3 question without revealing communications with
4 counsel, you can go ahead and do so.

5 THE WITNESS: So yeah, my understanding at
6 this point in time, that seeding and downloading can
7 involve risk, but I don't have -- like, I can't
8 estimate it or anyhow provide details on the risk.

9 BY MR. YOUNG:

10 Q. Okay, thank you.

11 And is that the same -- is that risk the
12 same risk that you're referring to when you were
13 saying -- do you recall yesterday we -- actually, let
14 me start that over.

15 Do you recall yesterday we saw a document
16 wherein you described torrenting LibGen as potentially
17 being legally not okay?

18 A. I remember.

19 Q. Okay. Is that the same risk that you are
20 describing sitting here today?

21 A. So that is what I was referring to right
22 now, yes.

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1 CERTIFICATE OF COURT REPORTER

2 I, LEAH M. WILLERSDORF, Registered Merit
3 Reporter, Certified Realtime Reporter, Fellow of the
4 British Institute of Verbatim Reporters, Qualified
5 Realtime Reporter Level 2, and Certified LiveNote
6 Reporter, do hereby certify that:

7 NIKOLAY BASHLYKOV appeared before me on Friday,
8 December 06, 2024, was sworn by me and was thereupon
9 examined by counsel; that the testimony of said
10 witness was taken by me stenographically; that the
11 foregoing is a true and accurate record to the best of
12 my knowledge, skill and ability; that I am neither a
13 relative nor employee of any party to the action in
14 which this testimony was taken; that I am neither
15 relative nor employee of any attorney or counsel
16 employed by any party thereto; and, further, I am not
17 financially or otherwise interested in the outcome of
18 the action.

19

20



21

LEAH M. WILLERSDORF

RMR, CRR, FBIVR, ACR, QRR2, CLR

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(December 08, 2024)